

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

CENTER FOR WORKPLACE COMPLIANCE
(f/k/a EQUAL EMPLOYMENT ADVISORY
COUNCIL),

Plaintiff and Counterclaim Defendant,

v.

LITTLER MENDELSON, P.C., LANCE E. GIBBONS,
THERESA GOKTURK (a/k/a CHRIS GOKTURK), and
DOE DEFENDANTS 1-10, INCLUSIVE,

Defendants and Counterclaimants.

Case No. 1:20-cv-01387-AJT-JFA

**PLAINTIFF CENTER FOR WORKPLACE COMPLIANCE'S
MEMORANDUM IN SUPPORT OF ITS MOTION TO SEAL**

Pursuant to Local Rule 5, Plaintiff and Counterclaim Defendant, Center for Workplace Compliance (“CWC”) hereby moves to file the following documents under seal:

- CWC’s Response to Littler Mendelson’s Report on Database Search Pursuant to June 11, 2021 Order.
- CWC’s Declaration in Support of CWC’s Response to Littler Mendelson’s Report on Database Search Pursuant to June 11, 2021 Order.
- Exhibits A-E, G, and J to the Declaration in Support of of CWC’s Response to Littler Mendelson’s Report on Database Search Pursuant to June 11, 2021 Order.

These documents contain quotes from, or summarizes information or documents designated by Defendant Littler Mendelson, P.C. as Confidential under the Protective Order. ECF No. 60.

When a party moves to file material under seal because another party has designated that material as confidential, the burden rests with the party designating the material as confidential to file a response to the motion explaining why sealing is necessary, providing references to relevant case law, and identifying the time period the party seeks to have the document maintained under seal. Local Rule 5. Accordingly, Littler must justify the sealing of information it designated confidential

Respectfully submitted,

Dated: July 8, 2021

MORGAN LEWIS & BOCKIUS LLP

By: /s/ Mark L. Krotoski
 /s/ J. Kevin Fee

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CERTIFICATE OF SERVICE

I, J. Kevin Fee, hereby certify that on the 8th day of July 2021, I served, via the court's electronic filing system PLAINTIFF CENTER FOR WORKPLACE COMPLIANCE'S NOTICE OF FILING OF A MOTION TO SEAL on all counsel of record.

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Dated: July 8, 2021

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